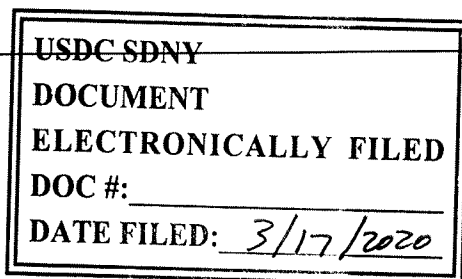




United States Attorney
Southern District of New York



86 Chambers Street
New York, New York 10007

March 17, 2020

BY ECF

Honorable Robert W. Lehrburger
United States Magistrate Judge
500 Pearl Street, Room 1960
United States Courthouse
New York, NY 10007

SO ORDERED:

[Signature]
HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE

Re: *The New York Times Company v. U.S. Department of State et al.*, 19 Civ. 9420 (RWL)

Dear Judge Lehrburger:

This Office represents the Department of State (the "State Department") and the Department of Justice (the "DOJ") and, together with the State Department, the "Defendants"), in the above-captioned action. We write respectfully on behalf of all parties to request a one-week extension, from March 19, 2020 to March 26, 2020, of the parties' current deadline to submit a proposed schedule for the processing and production of the remaining records that are potentially responsive to the requests at issue in this Freedom of Information Act, 5 U.S.C. § 552 ("FOIA"), lawsuit.

The State Department has nearly completed its search for and collection of potentially responsive records from the beginning dates of the requests through December 31, 2016, but still has a small number of outstanding items to finalize that process. Meanwhile, the parties have been engaged in negotiations to set specific parameters for a second production of responsive, non-exempt records from DOJ, and to continue to narrow the scope of potentially responsive materials. Though the parties have made progress in these negotiations, the parties are hopeful that an additional week will allow for further agreements. Moreover, both the State Department and DOJ are assessing the impact of the coronavirus emergency on their FOIA operations; rather than propose a schedule this week that may then need to be immediately modified, the Defendants believe that the additional time should allow them to more accurately assess their capacities for FOIA processing in the weeks ahead.

This is the parties' first request for an extension of the March 19, 2020 deadline to submit a further proposed schedule, and all parties are in agreement on the proposed extension.

We thank the Court for its consideration of and attention to this matter.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney for the
Southern District of New York

By: /s/ Andrew E. Krause
ANDREW E. KRAUSE
LUCAS E. ISSACHAROFF
Assistant United States Attorneys
Telephone: 212-637-2769/2737
Facsimile: 212-637-2786
E-mail: andrew.krause@usdoj.gov
lucas.issacharoff@usdoj.gov

cc: All counsel of record via ECF